

FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR VIOLATIONS OF THE
FEDERAL CONTROLLED SUBSTANCES ACT
AND THE FEDERAL GUN CONTROL ACT

UNITED STATES OF AMERICA

v.

CHRISTOPHER BROWN
aka "Stone"
LATONYA NARCISSE

CRIMINAL DOCKET NO.

SECTION:

VIOLATIONS: 21 U.S.C. § 846
21 U.S.C. § 856
21 U.S.C. § 841(a)(1)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 2

The Grand Jury charges that:

COUNT 1

Beginning at a time unknown but prior to May 2008 and continuing until on or about May, 21, 2008, in the Eastern District of Louisiana and elsewhere, the defendants, **CHRISTOPHER BROWN** aka "Stone" and **LATONYA NARCISSE**, did knowingly combine, conspire, confederate, and agree with each other and with other persons known and unknown to the grand

jury, to distribute and possess with the intent to distribute fifty (50) grams or more of cocaine base ("crack") and a quantity of cocaine hydrochloride, both Schedule II narcotic drug controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 841(b)(1)(C); all in violation of Title 21, United States Code Section 846.

COUNT 2

Beginning at a time unknown but prior to May 2008 and continuing until on or about May 21, 2008, in the Eastern District of Louisiana, the defendants, **CHRISTOPHER BROWN aka "Stone"** and **LATONYA NARCISSE**, while controlling a residence located at 806 Paul Frederick Street, Luling, Louisiana, as owners, occupants and lessees, did knowingly and intentionally make available for use without compensation said single family dwelling for the purpose of unlawfully, manufacturing, distributing, storing and using controlled substances, to wit, cocaine base ("crack") and cocaine hydrochloride, both narcotic drug controlled substances; all in violation of Title 21 United States Code, Sections 856(a)(1), 856(a)(2) and Title 18 United States Code, Section 2

COUNT 3

On or about May 21, 2008, in the Eastern District of Louisiana, the defendant, **CHRISTOPHER BROWN aka "Stone,"** did knowingly and intentionally possess with the intent to distribute more than five (5) grams of cocaine base, "crack," a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 4

On or about May 21, 2008, in the Eastern District of Louisiana, the defendants, **CHRISTOPHER STONE aka "Stone"** and **LATONYA NARCISSE**, did knowingly and intentionally possess with the intent to distribute fifty (50) grams or more of cocaine base ("crack")

and a quantity of cocaine hydrochloride, both Schedule II narcotic drug controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 5

On or about May 21, 2008, in the Eastern District of Louisiana, the defendant, **CHRISTOPHER BROWN** aka "Stone," having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on September 17, 2001, in the 29th Judicial District Court for the State of Louisiana, Case No. 01-0023, for distribution of marijuana, in violation of La. R.S. 40:966A, did knowingly possess in and affecting interstate commerce, a firearm, to wit: a Highpoint model C9, 9mm caliber handgun, serial number P1387139; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

NOTICE OF DRUG FORFEITURE

1. The allegations of Counts 1, 2, 3 and 4, of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.
2. As a result of the offenses alleged in Counts 1, 2, 3 and 4 the defendants, **CHRISTOPHER BROWN** aka "Stone" and **LATONYA NARCISSE**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts 1, 2, 3 and 4 of this Indictment.
3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of

Forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 853.

NOTICE OF GUN FORFEITURE

1. The allegations of Count 5 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 924 (d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Count 5, the defendants, **CHRISTOPHER BROWN aka "Stone" and LATONYA NARCISSE**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461, any firearm or ammunition, which was involved in or used in a knowing violation of Title 18, United States Code, Section 924(c)(1)(A).

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;


- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.


All in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924(d)(1).

A TRUE BILL:

FOREPERSON


JIM LETTEN
UNITED STATES ATTORNEY
Bar/Roll No. 8517


JAN MASELLI MANN
Chief, Criminal Division
Assistant United States Attorney
Bar Roll No. 9020


GINA S. VANN
Assistant United States Attorney

New Orleans, Louisiana
June __, 2008